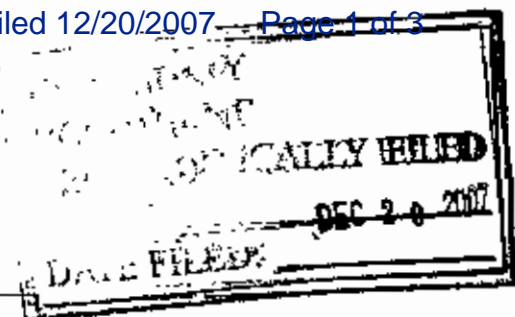


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



THE ASSOCIATED PRESS,

Plaintiff,

v.

MOREOVER TECHNOLOGIES, INC., and
VERISIGN, INC.,

Defendants.

07 CIV 8699 (GBD)

STIPULATION AND ORDER

Defendants VeriSign, Inc. and Moreover Technologies, Inc. (collectively "Defendants") and plaintiff The Associated Press ("Plaintiff"), through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, the parties previously sought and received an extension from the Court, so ordered October 26, 2007, that provided the Defendants with additional time to respond to the Complaint;

WHEREAS, on November 7, 2007, Defendants filed a Motion to Dismiss the Complaint (the "Motion to Dismiss");

WHEREAS, pursuant to the so ordered Stipulation of October 26, 2007, Plaintiff's response to the Motion to Dismiss was due on December 3, 2007;

WHEREAS, the parties sought an extension from the Court, so ordered November 27, 2007, to permit Plaintiff to file its response to the Motion to Dismiss by December 10, 2007;

WHEREAS, the parties subsequently sought a second extension from the Court, so ordered December 10, 2007, to permit Plaintiff to file its response to the Motion to Dismiss by December 21, 2007, and to permit Defendants to file their reply, if any, by January 11, 2008;

WHEREAS, the parties now seek to further extend the dates by which Plaintiff's response and Defendants' reply shall be filed;

WHEREAS, the Court by Order dated October 11, 2007, scheduled an initial conference for January 9, 2008, at 9:30 a.m.;

WHEREAS, the parties now seek to adjourn the initial conference.

NOW, THEREFORE, the parties stipulate and agree as follows:

1. The time for Plaintiff to file its response to the Motion to Dismiss is hereby extended to and including January 25, 2008.
2. Defendants shall file their reply, if any, on or before February 4, 2008.
3. The initial conference shall be adjourned to February 27, 2008, at 9.30 a.m. By no later than February 20, 2008, the parties shall (a) submit a proposed case management plan and scheduling order to the Court, or (b) advise the Court that they have not been able to reach an agreement on a proposed case management plan and scheduling order.

Dated: December 19, 2007

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Dated: December 19, 2007

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By: 
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Attorneys for Plaintiff
The Associated Press

SO ORDERED, this ____ day of ~~Dec~~ **20** **2007**, 2007


U.S.D.J.